



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

RECEIVED
FEDERAL ELECTION
COMMISSION

2013 MAR 13 AM 10:37 2013 MAR -8 PM 2:54

CELA

March 8, 2013

MEMORANDUM


SENSITIVE

TO: The Commission

FROM: Anthony Herman
General Counsel

Daniel Petalas
Associate General Counsel for Enforcement

Kathleen Guith
Deputy Associate General Counsel for Enforcement

BY: Mark D. Shonkwiler 
Assistant General Counsel

Kimberly D. Hart
Attorney

SUBJECT: MUR 6706 (Schiff for Senate)

RE: Pre-Probable Cause Conciliation Agreement

I. INTRODUCTION

On December 18, 2012, the Commission found reason to believe that Schiff for Senate and Andrew Schiff in his official capacity as treasurer (the "Committee"), violated 2 U.S.C. § 434(b) by failing to disclose all of its receipts and disbursements. See RR12L-07 Certification (Dec. 20, 2012). The Commission authorized us to attempt to settle the violations through pre-probable cause conciliation, and instructed us to negotiate pro-compliance measures. *Id.* Attached is a signed conciliation agreement. We recommend the Commission accept the signed agreement.

II. DISCUSSION

13044332888

1
2
3
4
5
6
7
8 Given these circumstances, as well as the Committee's willingness to obtain additional
9 funding from another source to pay a civil penalty, we believe that the conciliation
10 agreement is a fair
11 resolution of this matter.

12
13 **III. RECOMMENDATIONS**

- 14
15 1. Accept the attached conciliation agreement with Schiff for Senate and Andrew
16 Schiff, in his official capacity as treasurer.
17
18 2. Approve the appropriate letters.
19
20 3. Close the file.
21
22
23
24
25
26

13044332889